

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 00-6258-CR-<sup>WDF</sup>~~GONZALEZ~~

UNITED STATES OF AMERICA, )  
*Plaintiff,* )

vs. )

LIDIA RAMOS, )  
*Defendant.* )

FILED BY  
01 JUN -7  
CLERK OF COURT

**AGREED EMERGENCY MOTION TO CONTINUE**  
**SENTENCING DATE**

Defendant, LIDIA RAMOS, moves this Court for the entry of Order continuing the sentencing date: In support of this motion Defendant states as follows:

1. Undersigned represents Ms. Ramos in the above-mentioned case.
2. This matter is set for sentencing tomorrow, June 8, 2001 at 9:30 a.m.
3. The undersigned has had the Pre-Sentence Investigation Report available for approximately three (3) weeks.
4. When the undersigned received the PSI it was believed that the Defendant would not qualify for he Safety Valve. However, after conversations with the Defendant and AUSA Donald Chase, it appears that there is some ground in which to explore this issue. Given the fact that some Defendant's in this case have fled, Defendant Ramos and the government may resolve issues of Safety Valve once they have an opportunity to meet and obtain Ramos assistance in locating the defendant absconded at sentencing.

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5. Undersigned counsel should have looked into this before, however, due to my trial schedule involving other cases and personal illness, I was unable to do so.

6. Undersigned counsel has been ill for the past two (2) weeks with severe flu and throat/ear infection.

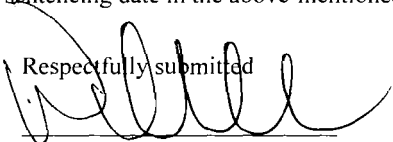
7. Counsel has not filed objections to the PSI and therefore has not properly prepared for tomorrow's hearing.

8. We are seeking a continuance of the sentencing date in order to meet with the government and possibly resolve all issues pending.

9. AUSA Donald Chase has been consulted and has no objections to the relief sought herein.

**WHEREFORE**, Defendant respectfully prays for this Honorable Court for the entry of an Order continuing the sentencing date in the above-mentioned case.

Respectfully submitted



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Fl. Bar No. 876739

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was  
mailed this 17<sup>th</sup> day of June, 2001 to:

Donald Chase, AUSA  
500 East Broward Blvd.  
Suite 700  
Ft. Lauderdale, Florida 33394

BY: 

Nelson Rodriguez-Varela, Esq.